



New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services • Peebles Island, PO Box 189, Waterford, New York 12188-0189

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Elliot Spitzer
Governor

Carol Ash
Commissioner

December 17, 2007

Kristin Leahy
Cultural Resources Program Manager
National Guard Bureau
Attn: ARE-C
111 So. George Mason Drive
Arlington, VA 22204

Re: ARNG
Brooklyn Navy Yard Officers' Housing (Admirals Row)
Kings County
03PR05477

Dear Ms. Leahy:

Thank you for requesting the comments of the New York State Historic Preservation Office (NYSHPO) for the proposed work at Admirals Row at the Brooklyn Navy Yard. We have reviewed the submitted report in accordance with Section 106 of the National Historic Preservation Act of 1966 and the relevant implementing regulations.

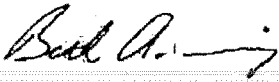
Based upon our review of the Beardsley and Design Associates and Crawford and Stearns, "Draft Assessment of Admiral's Row Buildings, Brooklyn Navy Yard" dated November 12, 2007 (Beardsley/Crawford Report) and our meeting on November 27, 2007 we offer the following comments:

1. We are very pleased with the level of detail and historic preservation expertise presented in the Beardsley/Crawford Report. It appears to present a comprehensive analysis of the historic structures and their existing condition.
2. Based upon our review of the Beardsley/Crawford Report our office concurs that the buildings at Admiral's Row, buildings B, C, D, E, F, G, H, I, K and L remain eligible for listing on the State and National Registers of Historic Places. These buildings contribute to a National Register-eligible historic district. We further concur that the buildings are eligible under Criteria A, B, C and D and are of national significance. We were surprised to learn of the existing brick timber shed located next to building K and its relative significance. Since the Beardsley/Crawford report did not address this building in detail, we request additional information regarding this resource to determine its eligibility for the State and National Registers of Historic Places.
3. In addition, our office concurs with the findings of the Beardsley/Crawford report that superstructures of the masonry buildings appear to be sound, level and plumb, showing areas of framing failures and masonry distress. In general, the buildings appear to be in much better condition than we previously believed. However, buildings C and F exhibit more severe structural concerns and the later 20th Century additions on all of the buildings are likely not salvageable due to major structural distress and failures. We further note that buildings B&D are of exceptional significance and attributed to architect Thomas U. Walter.
4. Comments regarding archeology are attached for your review.

At this point, it is our opinion that the 1996 MOA does not address the new findings provided in the Beardsley/Crawford Report particularly regarding the existing condition of the buildings superstructure. As you know, demolition of buildings eligible for the National Register is, by definition, an Adverse Effect. This finding triggers an exploration of prudent and feasible alternatives that might avoid or reduce project effects. As a matter of policy and practice, this exploration must occur before mitigation measures can be developed and before demolition can occur. We hope that appropriate alternatives will be considered including adaptive reuse and rehabilitation of the historic building and the site (including walls, fences, and landscape features). We are not opposed to the redevelopment of the site by the Brooklyn Navy Yard Redevelopment Corporation but it is critical that the alternatives analysis seriously consider how these nationally significant buildings can be creatively incorporated into the overall plan.

If you have any questions or if I can be of any assistance call me at (518) 237-8643, ext. 3282. Please refer to the SHPO Project Review (PR) number in any future correspondences regarding this project.

Sincerely,



Beth A. Cumming *BAC*
Historic Preservation Specialist – Technical Unit
e-mail: Beth.cumming@oprhp.state.ny.us

cc: Archeology comments

Admiral's Row Archaeology Concerns

After reviewing a series of Historic Maps and previously completed reports it is apparent that the vicinity of the Project Area has several potential archaeological issues which should be addressed. The maps clearly indicate that through the late 18th century the project area consists primarily of a bay making it highly unlikely that prehistoric cultural deposits are present. However, these same maps indicate that the shoreline of the Bay crossed through the southern edge of the project area, leaving a small area that may have been fast land within the project. The documentary evidence indicates that the Bay was used as a POW camp during the American Revolution. British ships anchored in the bay were used to house American Prisoners. There are extensive accounts that as prisoners died their bodies were taken ashore and buried along the shoreline and adjacent hills. Accounts exist of these bodies washing out throughout the late 18th to early 19th century until the shoreline was extended by filling. Even work done on the Yard during the 20th century has revealed a number of sets of remains in areas that were once used to bury the American dead. The potential that any remains are still in place within areas that may be impacted by the proposed project should be examined.

As the area developed, much of the Bay was filled in and turned into fast land; however a small section in the vicinity of the project area was retained as a pond. Documentary evidence suggests that this pond was actually employed in the ship building process, providing an area where large planks could soak to soften before being shaped to the ship. It is unclear from the maps if this pond had any structural additions to facilitate the process or if it was simply a natural bank enclosure. If evidence of the structural components of the pond or associated machinery remain they could provide important information on shipbuilding techniques of the period. Effort should be taken to identify if any such remnants remain intact.

The third area of archaeological concern is related to the earliest structures along Admiral's Row. At least these earliest structures seem to predate running water and sewage improvements to the area. Historic maps suggest that privies may have been located at the rear of these lots. Cisterns and other shaft features are also associated with sites of this period. Efforts should be made to identify which parcels are likely to contain such features (identify the dates that running water and sewer facilities were brought to the area and compare to construction dates) and then to test the appropriate parcels to determine if any deposits remain intact.

Several techniques should be helpful in gathering the data needed to assess issues. Soil core/bore information should be able to help identify the location of the original beach line and determine where within the project it may lie and what areas should be considered sensitive for potential human remains. The same technique may also be able to provide important data regarding the location of the pond and possibly (if a bore is placed in the correct location) if wooden structural features are associated with the pond.

Once the data from borings have been processed and evaluated to determine areas where these types of deposits might be located, mechanical excavation with a backhoe should be helpful in opening larger areas to identify if deposits are actually present.

Backhoe excavation, complemented by documentary analysis, should also be helpful in identifying if any shaft features associated with the early residences are present. SHPO will be happy to work with the project archaeologist to develop appropriate testing methods to address these concerns.